

IN THE U.S. DISTRICT COURT FOR MARYLAND  
GREENBELT DIVISION

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

THE RECREATION AND WELFARE  
ASSOCIATION OF THE NATIONAL  
INSTITUTES OF HEALTH

\*

\*

\*

\*

\*

\*

Plaintiff

2014 AUG 14 P 12:39

CLERK'S OFFICE  
AT GREENBELT

BY KC

v.

\*

Case No:

RWT 14 CV 2580

CREATIVE INTERNET MARKETING INC.  
and  
RUTH SRANGER

\*

\*

\*

\*

Defendants

\*\*\*\*\*

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1332(d), 1441 and 1446 Defendants Creative Internet Marketing Inc. and Ruth Sranger (hereinafter collectively “Sranger”) hereby removes this lawsuit from the Circuit Court of Montgomery County, Maryland to the U.S. District Court for Maryland, Greenbelt Division. As grounds for removal, GSK states as follows:

1. This case was filed in the Circuit Court for Montgomery County, Maryland on July 16, 2014, and a summons was issued on July 16, 2014. Exhibit A.
2. Plaintiff is asserting a claim for money damages arising from Sranger’s ownership and operation of a website and the use of copyrighted and trademarked materials.
3. Plaintiff is contesting ownership of the website and the written, copyrighted, materials and trademarks on the website.
4. This Court has subject matter jurisdiction over this action and all claims asserted against Sranger pursuant to 28 U.S.C.A. 1331 (federal question).

**I. THE PROCEDURAL REQUIREMENTS FOR REMOVAL ARE SATISFIED**

5. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b). Plaintiff served the Complaint on Sranger on July 19, 2014. This Notice of Removal is filed within thirty (30) days after receipt by Sranger of the initial pleading setting forth the claim for relief upon which the action is based.

6. Venue is proper in this Court pursuant to 28 U.S.C. § 1441(a), because the Circuit Court of Montgomery County, Maryland is located within the geographic boundaries of the District Court for Maryland. 48 U.S.C. §§ 1613, 1615.

7. In accordance with 28 U.S.C. § 1446(d), Sranger will file promptly a copy of this Notice of Removal with the Circuit Court of Montgomery County, Maryland. Sranger has served all parties with a copy of this Notice of Removal. Exhibit B.

**II. THIS COURT HAS FEDERAL JURISDICTION UNDER 17 U.S.C. 101 *et seq.***

8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331 and 17 U.S.C. §§101 *et seq.* and §501.

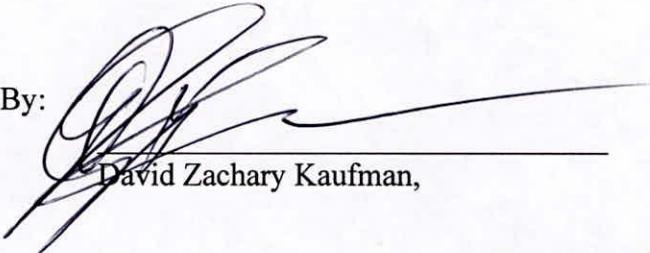
9. This action satisfies all requirements for federal jurisdiction under 17 U.S.C. §501 *et seq.*

WHEREFORE, for the reasons set forth above, Sranger requests that this Court assume full jurisdiction over this action as provided by law.

Respectfully submitted,

Kaufman Law Group, PLLC  
8000 Towers Crescent Drive, Suite 1350  
Vienna, VA 22182  
703.764-9080 (p)  
703.764.0014 (f)  
David@BusinessBrawls.com  
Counsel for Defendants

By:



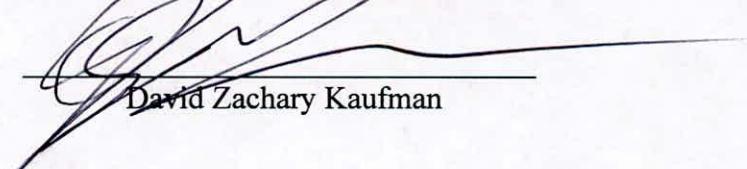
David Zachary Kaufman,

**Certificate of Service**

I hereby certify that on August 14, 2014, I faxed and mailed a copy of the foregoing to:

Theodore R. Goldstock  
3 Bethesda Metro Center  
Suite 460  
Bethesda, MD 20814  
(301) 347-1274 (Telephone)  
(301) 347-3744 (Facsimile)

Counsel for Plaintiff, The Recreation and Welfare  
Association of the National Institutes of Health



David Zachary Kaufman